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ATTORNEYS FOR APPALOOSA
MANAGEMENT L.P., WEXFORD CAPITAL LLC,
AND LAMPE CONWAY & CO., LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re)	Chapter 11
)	
Delphi Corporation, <u>et al.</u>)	Case No. 05-44481 (RDD)
)	Jointly Administered
Debtors.)	
)	

**VERIFIED STATEMENT OF WHITE & CASE LLP
PURSUANT TO FED. R. BANKR. P. 2019**

TO: THE HONORABLE JUDGE ROBERT D. DRAIN,
UNITED STATES BANKRUPTCY JUDGE

I, Frank L. Eaton on behalf of White & Case LLP (“W&C”), represent the creditors and parties-in-interest identified below,¹ and pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) states as follows:

¹ On May 1, 2006, W&C was retained by Pardus Capital Management L.P. and certain of its affiliates (collectively, “Pardus”) to represent Pardus’ interests in these chapter 11 cases arising on account of its beneficial

1. On November 18, 2005, shortly following the filing of the above-captioned chapter 11 cases (the “Cases”) of Delphi Corporation (“Delphi”) and its affiliated debtors and debtors in possession (collectively, with Delphi, the “Debtors”), W&C entered its appearance in these Cases to represent the interests of Appaloosa Management L.P. and certain of its affiliates (“Appaloosa”). Appaloosa’s affiliates include Appaloosa Investment Limited Partnership I, Palomino Fund Ltd., Appaloosa Partners Inc., and David A. Tepper. Appaloosa has a business address of 26 Main Street, Chatham, New Jersey 07928.

2. Appaloosa has claims against the Debtors arising on account of its beneficial ownership of approximately 9.3%, or 52,000,000 shares, of Delphi’s issued and outstanding common shares, which Appaloosa purchased on or about October 10 and 11, 2005.

3. In addition, on April 21, 2006, W&C was retained by Wexford Capital LLC and certain of its affiliates (collectively, “Wexford”) to represent Wexford’s interests in connection with the Cases. Wexford’s affiliates include IOTA Investors LLC, Wexford Catalyst Investors LLC, DeBello Investors LLC, and Wexford Spectrum Trading Ltd. Wexford, with the exception of Wexford Spectrum Trading Ltd., has a business address of 411 West Putnam Avenue, Greenwich, Connecticut 06830. Wexford Spectrum Trading Ltd. has a business address of Walker House, Mary Street, Georgetown, Grand Cayman, Cayman Islands.

4. Wexford has claims against the Debtors arising on account of its beneficial ownership of approximately 3.2%, or 18,114,412 shares, of Delphi’s issued and outstanding common shares, which Wexford purchased between September 30, 2005 and December 2, 2005.

5. In addition, on or about May 2, 2006, W&C was retained by Lampe Conway & Co., LLC and certain of its affiliates (collectively, “Lampe”) to represent Lampe’s interests in

ownership of approximately 4.7%, or 26,400,000 shares, of Delphi’s issued and outstanding common shares. On or about May 11, 2006, Pardus was appointed to the Official Committee of Equity Security Holders. On May 18, 2006 Pardus agreed to release W&C from its representation of Pardus in these chapter 11 cases.

connection with these Cases. Lampe has a business address of 680 Fifth Avenue, 12th Floor, New York, New York 10019.

6. Lampe has claims against the Debtors arising on account of its beneficial ownership of approximately 1%, or 5,348,700 shares, of Delphi's issued and outstanding common shares, which Lampe purchased at various times between April 2005 through April 2006.

7. Appaloosa and Wexford also hold individual claims that, in the aggregate, exceed \$141 million on account of their respective ownership of debt securities issued by the Debtors.

8. W&C does not hold any claim against or equity interest in the Debtors. However, W&C may at some future time seek to have its fees and expenses reimbursed by the Debtors' estates in accordance with title 11 of the United States Code.

9. W&C has complied with its ethical obligations with respect to advising its clients regarding this concurrent representation. The clients identified herein have no agreements, arrangements or understandings between or among each other with respect to acquiring, holding, or disposing of the securities of Delphi.

10. In the event W&C undertakes additional representation of other clients in these Cases, this Statement shall be supplemented in accordance with Bankruptcy Rule 2019.

VERIFICATION

I, Frank L. Eaton, Esq., an attorney of White & Case LLP, after due inquiry declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the facts and representations set forth in this verified statement in accordance with Bankruptcy Rule 2019 are true and correct to the best of my knowledge, information and belief.

Dated: May 19, 2006
Miami, Florida

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By: /s/ Frank L. Eaton
Frank L. Eaton

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MANAGEMENT L.P., WEXFORD CAPITAL
LLC, AND LAMPE CONWAY & CO., LLC

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **Verified Statement of White & Case LLP Pursuant to Fed. R. Bankr. P. 2019** to be duly served on May 19, 2006 by first class mail postage pre-paid on the following parties:

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By: /s/ Frank L. Eaton
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